## **IEVGENIIA P. VATRENKO, ESQ.**

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July 25, 2025

## **VIA ECF**

Judge Joan M. Azrack 100 Federal Plaza Central Islip, NY 11722 Magistrate Judge Anne Y. Shields 100 Federal Plaza Central Islip, NY 11722

Re: SDN Limited et al. v. IOV Labs Limited et al., Case No. 2:24-cv-6089

Dear Judge Azrack and Judge Shields:

I represent Plaintiffs SDN Limited and Steven Nerayoff in the above-referenced case. I write pursuant to the Court's July 18, 2025, order directing Plaintiffs to file a status report.

Since the last status report, Plaintiffs have amended the complaint to correct factual inaccuracies and add two causes of action. Plaintiffs provided a copy of the proposed amended complaint to Defendants and subsequently met and conferred with Defendants about the proposed amendments on July 14, 2025. Defendants have not agreed to stipulate to Plaintiffs' filing of the amended complaint, and Plaintiffs will file a motion for leave to amend the complaint on or before August 21, 2025.

Respectfully submitted,

Ievgeniia P. Vatrenko, Esq.

cc: All counsel of record via CM-ECF